

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,  
RICARDO GONZALES, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 1:17-cv-02246

Judge Edmond E. Chang

Magistrate Judge Sheila Finnegan

**DECLARATION OF CAREY  
ALEXANDER IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT WALGREEN CO.'S  
MOTION TO STRIKE OR EXCLUDE  
LYNETTE HILTON'S REBUTTAL  
REPORT AND ANY TESTIMONY  
REGARDING THE SAME PURSUANT  
TO FEDERAL RULES OF EVIDENCE  
702 AND 403 AND FEDERAL RULE OF  
CIVIL PROCEDURE 26**

I, Carey Alexander, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am a partner at the law firm of Scott+Scott Attorneys at Law LLP and admitted to practice before this Court. I submit this Declaration in support of Plaintiffs' Opposition to Defendant Walgreen Co.'s ("Walgreens") Motion to Strike or Exclude Lynette Hilton's Rebuttal Report and any Testimony Regarding the Same Pursuant to Federal Rules of Evidence 702 and 403 and Federal Rule of Civil Procedure 26. I have personal knowledge of the facts set forth herein and could testify competently to them if called upon to do so.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the December 5, 2019 deposition of Megan Butterfield, which has been designated as Walgreens' corporate testimony.

3. Attached hereto as **Exhibit B** is a true and correct copy of correspondence sent by counsel for Walgreens to Plaintiffs' counsel, dated March 4, 2020.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the November 20, 2019 deposition of Michael Amiet, testifying as Walgreens' 30(b)(6) designee.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on the 15th day of November, 2023, in New York, New York.

/s/ Carey Alexander  
Carey Alexander

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo